

ROBERT P. VARIAN (SBN 107459)
 CHARLES J. HA (*pro hac vice*)
 DAVID KEENAN (*pro hac vice*)
 ORRICK, HERRINGTON & SUTCLIFFE LLP
 405 Howard Street
 San Francisco, CA 94105
 Telephone: (415) 773-5700
 Facsimile: (415) 773-5759
 Email: rvarian@orrick.com

Attorneys for Plaintiffs
 [Additional Counsel appear on signature page]

BENJAMIN C. MIZER
 Principal Deputy Assistant Attorney General
 WILLIAM C. PEACHEY
 Director, District Court Section
 ELIZABETH J. STEVENS
 Assistant Director, District Court Section
 JENNIFER A. BOWEN
 KATHERINE J. SHINNERS
 BRIAN C. WARD
 Trial Attorneys, Office of Immigration Litigation
 U.S. Department of Justice – Civil Division
 P.O. Box 868, Ben Franklin Station
 Washington, D.C. 20044
 Telephone: (202) 616-9121
 Facsimile: (202) 305-7000
 Email: Brian.C.Ward@usdoj.gov

Attorneys for Defendants

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

AUDLEY BARRINGTON LYON, JR., et. al.,
 Plaintiffs,
 v.
 UNITED STATES IMMIGRATION AND
 CUSTOMS ENFORCEMENT, et. al.,
 Defendants.

Case No.: 13-cv-05878 EMC

**JOINT STIPULATION REGARDING
 REDACTION OF WITNESS NAMES
 EXCEPT INITIALS; [PROPOSED]
 ORDER**

[PURSUANT TO CIVIL L.R. 7-12]

CLASS ACTION

1 The Parties to this action hereby agree to the following regarding the redaction of the
2 names of certain declarants in this litigation as permitted by the Federal Rules of Civil Procedure
3 Rule 5.2(e). WHEREAS:

4 Many Plaintiff class members are seeking or have sought relief from removal based on
5 fear of persecution and in their home countries or based on other grounds that could subject them
6 to retaliation here or abroad;

7 Plaintiff class members seeking such relief may have statutory privacy rights to protect
8 them from harm. *See e.g.* 8 C.F.R. §§ 208.6, 1208.6 (regulations protecting an asylum-seeker's
9 right to confidentiality);

10 Plaintiff class members seek to submit declarations in support of Plaintiffs' motion for
11 summary judgment, some of which include references to statutorily protected claims for relief or
12 sensitive facts that create concern regarding harassment and retaliation; and

13 The Parties agree that protecting Plaintiff class members from potential harm related to
14 disclosure of their identities and the subject matter of their immigration cases can be achieved
15 without prejudice to Defendants by substituting initials for class member witnesses' full names
16 in the parties' briefs and evidentiary submissions.

17 NOW THEREFORE, the Parties stipulate that:

18 1. Papers and evidence filed in the public record will be redacted to reveal only
19 initials of Plaintiff class member witnesses who are not named representatives;

20 2. The names of class representatives will not be redacted;

21 3. In conjunction with Plaintiffs' Motion for Summary Judgment, Plaintiffs will file
22 under seal a reference list of the declarants' full names and corresponding initials, pursuant to
23 Fed. R. Civ. Pro. 5.2(g); and

24 4. The Parties need not file unredacted versions of the papers and evidence filed in
25 the public record in accordance with paragraph 1 under seal, serve unredacted versions of such
26 papers or evidence upon each other, or provide such unredacted versions as courtesy copies to
27 the Court.

1 THE PARTIES SO STIPULATE, THROUGH THEIR COUNSEL OF RECORD.

2
3 Dated: December 15, 2015

By: /s/ Julia Harumi Mass

JULIA HARUMI MASS (SBN 189649)
ANGÉLICA SALCEDA (SBN 296152)
MICHAEL T. RISHER (SBN 191627)
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111
Telephone: (415) 621-2493
Facsimile: (415) 255-8437
Email: jmass@aclunc.org

ORRICK, HERRINGTON & SUTCLIFFE LLP
ROBERT P. VARIAN (SBN 107459)
CHARLES J. HA (*pro hac vice*)
DAVID KEENAN (*pro hac vice*)
JUDY KWAN (SBN 273930)
ALEXIS YEE-GARCIA (SBN 277204)

AMERICAN CIVIL LIBERTIES UNION
NATIONAL PRISON PROJECT
CARL TAKEI (SBN 256229)
915 15th Street N.W., 7th Floor
Washington, DC 20005
Telephone: (202) 393-4930
Facsimile: (202) 393-4931
Email: ctakei@aclu.org

VAN DER HOUT BRIGAGLIANO &
NIGHTINGALE, LLP
MARC VAN DER HOUT (SBN 80778)
MEGAN SALLOMI (SBN 300580)
180 Sutter Street
San Francisco, CA 94104
Telephone: (415) 981-3000
Facsimile: (415) 981-3003
Email: msal@vblaw.com

Attorneys for Plaintiffs

1 Dated: December 15, 2015

OFFICE OF IMMIGRATION LITIGATION,
CIVIL DIVISION
U.S. DEPARTMENT OF JUSTICE

3 BENJAMIN C. MIZER
4 Principal Deputy Assistant Attorney General

5 WILLIAM C. PEACHEY
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9 By: /s/ Brian C. Ward

BRIAN C. WARD

JENNIFER A. BOWEN

KATHERINE J. SHINNERS

Trial Attorneys, District Court Section

P.O Box 868, Ben Franklin Station

Washington, D.C. 20044

Telephone: (202) 616-9121

Email: Brian.C.Ward@usdoj.gov

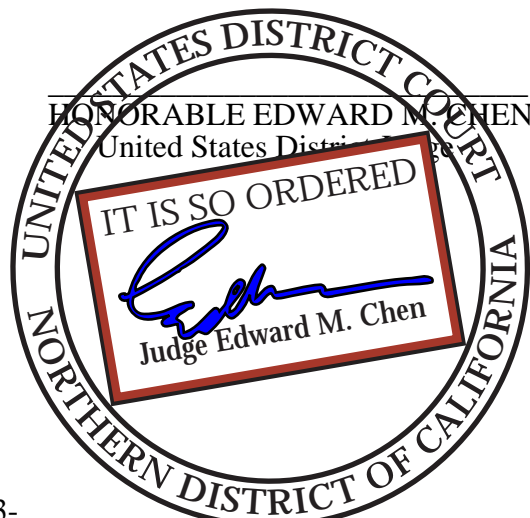
14 *Attorneys for Defendants*

17
18 **[~~PROPOSED~~] ORDER**

19
20 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

21 Dated: December 16, 2015

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CERTIFICATION OF CONCURRENCE FROM OTHER PARTIES

I, Julia Harumi Mass, am the ECF user whose ID and password are being used to file this Joint Stipulation Regarding Redaction of Names Except for Initials and [Proposed] Order. I hereby certify that each of the other signatories has concurred in the filing of this document and has authorized the use of his/her electronic signature.

Dated: December 15, 2015

/s/ Julia Harumi Mass
JULIA HARUMI MASS
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111